

Preliminary Recommendations

The assessment of the Comprehensive Plan as requested by the Mayor and the City Council has illuminated key opportunities to strengthen the Comprehensive Plan, ensure that it is used more widely, and position it among a system of plans that serve the varied needs of the District. Since October, a 29-member Task Force, a team of consultants and the Office of Planning have been meeting to discuss approaches to strengthening the Comprehensive Plan. This analysis included: conducting interviews with key community/business leaders; interviews with key District decision-makers and agencies; research on Comprehensive Plans in other cities; consultant analysis; and valuable feedback from the Task Force.

There are two threads interwoven in the recommendations. First, the recommendations strengthen the role of planning in the District, creating a thoughtful and deliberative framework to allow citizens and leaders to make wise choices about the future of the District. Second, we see an opportunity to create a truly important/significant/new milestone Comprehensive Plan. Our current Comprehensive Plan was last fully updated almost two decades ago. It is time to conduct a major rewrite of our Comprehensive Plan to not only ensure it remains relevant, but that it offers a thoughtful and inspiring framework for future development in the District.

The paragraphs below synthesize the key recommendations for strengthening the District Elements of the Comprehensive Plan and improving the Comp Plan development and amendment process.

1. **Create a Clear Vision for the City.** Develop a clear vision, which articulates the intended future of this city. This exercise would begin by identifying the key challenges facing the city, drawing on an analysis of issues and trends. This work would then help frame the direction and issues that need to be addressed by the Comp Plan. The vision would include guidance for both the physical and social aspects of our city and serve as the guide for many City plans and policies.
2. **Embark on a Major Revision of the Comp Plan.** Based on the directions established in the Vision, revise the Comp Plan. The Comp Plan was written 20 years ago and inadequately addresses many key issues facing the city today. The Comp Plan is also currently drafted in a legal format, which makes it a very difficult document to understand and digest.

The revised Comp Plan should tell a story that helps guide and inspire activities in the District. The Comp Plan should be based on and include the analysis of key trends and issues and opportunities examined as part of the visioning exercise. Its recommendations and policies should be linked to the analysis of trends and issues to ensure that the recommendations are substantiated. The Comp Plan should be reduced in size, developed in a more user-friendly format and writing style, and contains numerous graphics and maps that clearly communicate intent.

3. **Make the Plan a Hybrid Plan – combining physical and social components.** The Comp Plan should address social and physical issues. It should speak authoritatively on physical and economic issues and clearly guide the city's growth and redevelopment. In

addition to elements such as land use, economic development, transportation, and housing, additional topics that are now omitted from the plan that should be addressed include parks, recreation and open space; the environment; and more detail on public facilities. Because many issues related to the physical and economic well being of the city have social components, the Comp Plan should also provide strategic direction on social issues such as literacy, homelessness and job readiness/skills. This direction may include restating directives from existing plans, such as Safe Passages.

4. **Create a New and Simpler “Family of Plans” that Provides Guidance from the Citywide Level to the Neighborhoods.** Specific recommendations include:

4.1 Citywide Elements. The Comp Plan should be: 1) organized around addressing major themes that the Comp Plan seeks to address to better tell a story; these themes would be a unifying device, 2) make the ideas of the plan more accessible using graphics and maps throughout, and 3) allow users to find information and recommendations more easily.

The citywide recommendations should be broad enough to apply to multiple situations. However, the citywide elements should also include more specific guidelines for siting various types of facilities and uses. Some of these could include large sites, various public and community facilities and institutions. What the Comp Plan will not do is provide site-specific direction (such as on a particular square or lot).

The intent of the citywide portion of the Comp Plan should be two-fold: 1) a policy document, articulating important policies to help realize the vision; and 2) an agenda plan, in that it will include clear “to-do” lists that identify the implementers responsible for a task and a due date.

4.2 Incorporate Relevant Policies in the Ward Plans to Other Sections of the Comp Plan and Eliminate the Ward Plans. Ward Plans are based on electoral boundaries and do not relate to planning issues or areas of special concern. Many of the inconsistencies and contradictions within the current Comprehensive Plan emanate from the Ward Plans. While there was value in developing the Ward Plans – providing a framework for neighborhood-oriented planning in the city – it is recommended that they now be replaced by the citywide elements and “Area Plans” (see below). This means that relevant policies and strategies articulated in the Ward Plans will be moved to either the citywide elements when policies are citywide in scope or to “Area Plans” when the strategies/policies pertain to neighborhoods.

4.3 Area Plans. Redefine “Small Area Plans” to “Area Plans”, allowing their size and scope to be determined as necessary. Area Plans should be linked to the direction and policies articulated in the Comp Plan. Area Plans are envisioned to address special concerns and conditions in neighborhoods or defined special areas or issues. It is not envisioned that there will be an Area Plan for all areas of the city. Area Plans, depending on the situation, could be: (1) design plans that result in a specific physical plan; (2) agenda plans – that are mainly lists of actions to be undertaken; (3) strategic guidance that presents contingent actions or paths whose choice depends on different ways to address local issues; or (4) topical, for instance an Area Plan could provide guidance for several similar corridors in one plan.

The Comp Plan should identify the first set of Area Plans that need to be done (and the timeline) along with specific criteria to be used in define/undertake additional Area Plans. Language in the Code needs to be changed so that Area Plans are adopted by legislation instead of resolution, so Area Plans become part of the Comp Plan instead of “a supplemental guide.” Proposed Area Plans could be submitted as amendments to the Plan at any time and would not be subject to the amendment cycle. They would of course be subject to the public hearing and approval process.

4.4 Improve the Comp Plan Maps. Several recommendations for improving the maps are suggested: 1) revise the Policy Map so that it tells the story of what the city is to become by highlighting changes/interventions that Comp Plan recommends; 2) consolidate or streamline the categories listed on the Land Use Map; 3) change the name of the Land Use Map to the Land Use Planning Map; and 4) indicate on the map how the land use categories relate to zoning.

5. **Link the Comp Plan to the CIP.** The Office of Planning should have a substantial role in the management and preparation of the CIP using guidance from the Comp Plan. Although this role for OP is a new proposal for this city, this is common practice in cities across the country. This sets the foundation for strong and meaningful planning and implementation and is therefore one of the most important recommendations in this document.
6. **Strengthen the Link to Zoning.** In the Comp Plan and in amendments to the Comp Plan, identify the priorities for updates to the Zoning Regulations and changes to the map that are necessary to implement the Comp Plan as a means of providing guidance to the Zoning Commission. When a Comp Plan update is likely to have numerous implications for the Zoning Regulations that are unlikely to be addressed using a piecemeal amendment process, ask the Zoning Commission to consider the feasibility of conducting a major update to the Zoning Regulations shortly following the adoption of the updated Comp Plan.

Ideas have also surfaced about changing the “shall not be inconsistent to” language to “shall be in conformance with” as another means of strengthening the relationship between the Comp Plan and the Zoning Regulations. We recommend however, that this idea be explored at a later date, during or after, the establishment of a Planning Commission.

7. **Create a Planning Commission.** Most cities across the country have had – and relied upon -- planning commissions since the mid-1900s. A Planning Commission would play an important role in ensuring that planning has an independent voice and that proposed plans are adequately reviewed, considered and adopted. Another key function of a Planning Commission would be to facilitate public discourse, which could allow more time for public debate on proposed amendments prior to the City Council public hearings. The role of the Planning Commission should therefore include making recommendations to the Mayor or Council on Plan updates and amendments; holding hearings and making recommendations on the draft CIP and other plans (such as Area Plans); and reviewing the federal elements of the Comprehensive Plan and their CIP. The Office of Planning would provide the necessary support to the Planning Commission.

There are a number of options for creating the Planning Commission that could be considered. Two are highlighted below. We recommend option 1: The options include:

- (1) Under the Home Rule Charter, the "Mayor shall be the central planning agency for the District", and as such, the Mayor could appoint a Planning Commission by Mayor's Order or work with Council in passing legislation. The Planning Commission would then make recommendations to Mayor on planning matters. The Mayor would then forward the items to Council for adoption; and
- (2) If the city wants to create a Planning & Zoning Commission (expanding the scope of the existing Zoning Commission) that would provide recommendations to the Mayor and Council, the Home Rule Charter would need to be amended.

The ultimate goal however, is to seat a new Planning Commission prior to the adoption of the new Comp Plan.

8. Strengthen the Linkage with Federal Government Planning Efforts.

Recommendations include:

- Create a new section of the Comp Plan that addresses the intersection of federal and District issues. Topics could include transportation and parking, balancing new security concerns with urban design goals, transfer of federal property, location of federal buildings and monuments, etc.
- Have the Planning Commission consider and comment on the Federal government's annual CIP.
- Synchronize the cycles for amending or updating the DC elements and the federal elements of the Comprehensive Plan.

9. Improve the Amendment Process. Recommendations include:

Amendments and Updates:

- Distinguish plan amendments from plan updates: Amendments are minor adjustments to the Comp Plan. Updates are major reconsiderations of the overall document and must be backed by thorough analysis of data. Amendments need to occur more frequently than updates.
- Undertake a Plan update at least every ten years.
- Prepare/solicit amendments every four years (offset from the Mayoral and Council elections to ensure that this process does not coincide with Mayoral and City Council elections).

Amendment Submittal and Analysis:

- Redefine submittal requirements, where proposers must write a more detailed argument for the proposed amendment, including: the purpose of amendment, its importance, how it's currently being addressed, possible impacts of the proposal, and potential alternatives to the proposal that do not require an amendment.
- Develop more specific criteria to be used by the Office of Planning when evaluating proposed amendments. The existing amendment criteria are quite general and do not provide enough specific guidance on what amendments are appropriate.
- The Office of Planning develops an Impact Analysis Report, which assesses: 1) the potential effects of each proposed amendment on the environment, traffic, public facilities, fiscal needs, etc.; 2) the proposed amendment's consistency with the Comp

Plan; 3) whether the proposed amendment could be addressed by other means than amending the Comp Plan; and 4) the cumulative impacts of all amendments to be considered by the Council in the cycle. This report should be prepared for the Planning Commission, the Mayor and City Council. Council action on amendments could also be expedited if they are provided with additional information on probable impacts.

Approval Process:

- All new amendments that are introduced during the Council approval process should require Office of Planning analysis and an additional Council reading.
- Amendments that are modified during the approval process should be read a third time (normally the Council has two readings).
- To facilitate a more timely plan amendment process, change the timing of the amendment process so that it does not coincide with the Council's springtime budget approval process and does not result in plan amendment public hearings during the summer.
- Expedite the processing of Comp Plan amendments. The existing Plan requires OP to present recommendations to the Mayor within 150 days after the amendment submittal deadline. This requirement should be retained, as it provides an opportunity for public input and OP analysis of amendment impacts. A similar timeframe for Council action (after amendments are received from the Mayor) should also be considered. A time limit of 150-180 days for Council action is recommended.

10. **Link other Plans to the Comp Plan.** The following outlines some of the linkages that should be made among various city plans and the Comp Plan.

- Use Common Projections and Assumptions for all City Plans. There needs to be a common base of trends and forecasts that are used by the city for planning purposes. The assumptions included in the Comp Plan about population, housing, employment, etc., should become the basis for all other planning efforts – housing plans, transportation plans, public facilities plans so that all plans and policies are using the same foundation.
- CWSP. The Citywide Strategic Plan is developed every two years drawing from citizen preferences expressed at the Citizen Summits. The CWSP describes a series of priorities and budget commitments to support action on the priorities. The CWSP is also used to inform performance contracts with all senior officials in the administration. There is value in this and it should continue. The new Vision for the city would inform and drive the CWSP as well as other major planning documents. The relationship between the CWSP and the new Comprehensive Plan should have two aspects. On topics where the Comprehensive Plan speaks with authority, the CWSP should be viewed as an implementation tool and follow the guidance of the Comprehensive Plan. When the CWSP addresses issues outside the purview of the Comprehensive Plan, it should be viewed as the guiding document for the District.
- Transportation Vision Plan. For the upcoming Comp Plan revision, the TVP will serve as a basis for the Transportation Element of the Comp Plan. In addition, the Comp Plan could build upon the Vision Plan and focus on the integration of land use and transportation

objectives. In future updates, the Transportation Vision Plan and the Comp Plan should be developed/updated jointly.

- Safe Passages. The Comp Plan should be informed by Safe Passages including relevant recommendations from Safe Passages that relate to the location of facilities. Key recommendations related to family life that facilitate the achievement of economic growth and development of DC households and businesses should also be included.
 - SNAPS. The SNAPS were envisioned to be short-term (two-year horizon) documents that include neighborhood budget priorities and serve as one of the inputs to the Citywide Strategic Plan. Perhaps they should be more accurately called Neighborhood Priorities rather than “plans” to differentiate their focus and intent. One complete set of SNAPS was completed 2001-2002 for each of 39 neighborhood clusters that encompass the entire District. The Mayor should review whether the SNAPS will continue and be updated. The process was a positive one that involved thousands of people, although the process was costly and absorbed significant Office of Planning staff resources. One option would be for the process to continue in some form with the outcome used as input to the CIP and Citywide Strategic Plan rather than as a separate planning document. The current SNAPS should also be reviewed during the initial Comp Plan update to highlight those items that could be incorporated into the Comp Plan.
 - Public Facilities. There is currently no citywide plan for public facilities. The Comp Plan should be the plan that identifies the city’s public facilities needs and existing facility locations and the potential locations for new facilities.
 - Parks and Recreation. There is currently no citywide parks plan. If that continues to be the case, the Comp Plan should be the plan that identifies the city’s parks and recreation needs and existing facility locations and the potential locations for new facilities.
11. **Monitor Plan Implementation and Make Annual Progress Reports.** The District needs to be able to measure success in plan implementation. The Office of Planning should prepare annual progress reports to track progress and help identify needed amendments. The use of measurable indicators in the Comp Plan would help all understand what progress is being made.
12. **Establish Priorities.** The Comp Plan should set priorities among the recommended actions and identify who would be responsible for implementation – a clear “to do” list. It is important to indicate what needs to be done in the short-term, next, and ultimately. City officials and external stakeholders need to understand what the priorities are so implementation can be monitored and the responsible District government agencies held accountable. This to-do list can and should be modified when the Comp Plan is being amended.